

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION

UNITED STATES OF AMERICA §  
§  
v. § NO. 5:13-cr-13-1  
§  
§  
SHANNON GUESS RICHARDSON §

**GOVERNMENT'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION  
FOR REDUCTION OF SENTENCE UNDER 18 U.S.C. § 3582(c)(2)**

Defendant Shannon Guess Richardson has filed a motion under 18 U.S.C. § 3582(c)(2) (doc. 100) seeking a reduced sentence based on Part B, subpart 1 of Amendment 821 to the Sentencing Guidelines. While Richardson did have a criminal history score of zero, PSR (doc. 53) ¶ 50, she is not eligible for relief under the retroactive application of Part B to Amendment 821 because she “used violence or credible threats of violence in connection with the offense[.]” U.S.S.G. § 4C1.1(a)(3).<sup>1</sup> The record shows that Richardson used violence by sending actual ricin in letters sent to three people, including then-President of the United States Barak Obama and then-Mayor of New York City Michael Bloomberg. *Id.* at ¶¶ 8, 10, 12.

<sup>1</sup> While the probation department determined in the PSR that the terrorism enhancement under U.S.S.G. § 3A1.4(a) applied, PSR ¶ 40, at sentencing the Court did not apply it, Sentencing Tr. (doc. 79) 12-13.

Respectfully submitted,

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